



HOLLYFRONTIER

HOLLY REFINING & MARKETING COMPANY – WOODS CROSS LLC

1070 West 500 South • West Bountiful, Utah 84087-1442

(801) 299-6600 • Fax (801) 299-6609

November 14, 2013

UTAH DEPARTMENT OF
ENVIRONMENTAL QUALITY

NOV 18 2013

Mr. Bryce Bird, Director
Utah Division of Air Quality
P.O. Box 144820
Salt Lake City, Utah 84114-4820

DIVISION OF AIR QUALITY

RE: **Comments to Proposed SIP Subsections IX.H.11, 12, and 13.**

Dear Mr. Bird:

Provided below are my comments to the proposed SIP Subsections IX.H.11, 12, and 13. I appreciate your attention to these critical issues.

H.11.e.i.C-D – It is widely recognized that Methods 201 and 202 yield results for particulates that are significantly higher than reality, especially due to artifact formation when determining condensables. Instead of requiring methods that will result in extraordinarily high particulate matter results, and leaving only an option to use “other EPA-approved testing methods acceptable to the Director,” the State should include more appropriate methods such as U.S. EPA CTM-039, which is a dilution sampling method. In addition, there are modifications to CTM-039 that increase sensitivity and make it even more accurate for measuring particulates from natural gas-fired equipment, which typically has lower PM emissions than the sources that Methods 201 and 202 are suited for. It would be best if the State specified this method and its modifications to prevent the development and submission of erroneous data. For further information on this issue, please refer to the comments submitted to DAQ on October 31, 2013 by Environmental Resources Management (“ERM”) on behalf of the Utah Manufacturer’s Association, Utah Mining Association, and Utah Petroleum Association at pages 3 and 4 (incorporated herein by reference).

H.11.g.iv – Implementing this requirement as proposed will require a significant initial effort, as the regulations require monthly monitoring before moving to quarterly monitoring. Since existing components have been previously monitored subject to higher leak limits, we request that the State allow the use of prior monitoring to establish initial skip monitoring periods.

H.11.g.v.B – Recovery of gases from HF alkylation and acid gas from sulfur recovery units creates significant mechanical integrity and safety problems. We request that flare gas recovery not be required for sulfur recovery unit relief or hydrofluoric acid alkylation unit relief. Periods of startup, shut down, or malfunction are excluded, and we are assuming this includes unit purging with nitrogen as part of an orderly shutdown, since it would be undesirable to recover that nitrogen purge in a flare gas recovery system and send it to fuel.

H.11.k – Company name. Please note that the name of our parent corporate entity is HollyFrontier Corporation, and the name of the refinery operating company is Holly Refining & Marketing Company – Woods Cross LLC.

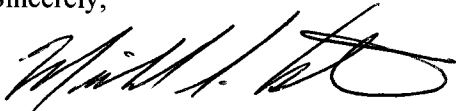
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H.11.k.i – The particulate matter limit for Holly was assumed to include both filterable and condensable fractions. However, the limits for other sources, including the other 3 refineries, were set to include only the filterable fraction, with the stipulation on some of these to add the condensable limit for one or more individual pieces of equipment at a later date. We request that for purposes of the SIP, the particulate limit for Holly be specified for the filterable fraction only, consistent with other sources.

General comment 1 – Please note also that the SIP limits are based upon a permit revision for Holly that, as of the date of this letter, has not been issued. The permit revision utilizes emission reduction technologies that are not possible without the equipment included in the revision.

General comment 2 – The benefit of the additional controls on oil refineries has not been quantified. Based on presentations by the Division of Air Quality, the industrial sector is a minor contributor to the overall PM 2.5 ambient concentrations. In fact, many of the reductions being claimed by the mobile sector are, in fact, made possible by the changes in producing fuels that have been and are being made by oil refineries. Because the refining industry is already tightly regulated and contributes so little to the total PM 2.5 inventory, the further reductions being required of refineries will not help achieve the NAAQS. Various groups have proposed further controls on the oil refining industry in order to improve the effectiveness of the SIP. However, given the minor portion of the inventory contributed by refining, and the even more minor reductions that are achievable through even the strictest controls, these proposed controls will not contribute to achieving the NAAQS, and thus far, I have seen no demonstration that any of the controls do so. Further, the cost per ton of reduction for such controls has been presented to the Division of Air Quality as significantly higher than what has been considered in the past for reasonable control technology. The State should not ignore their own data that clearly shows that reducing the emissions from the oil refineries will not help achieve the NAAQS.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael S. Astin", with a stylized flourish at the end.

Michael S. Astin, P.E.
Environmental Manager

SIP

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Utah Division of Air Quality
P.O. Box 144820
Salt Lake City, Utah 84114-4820

RE: **Additional Comment to Proposed SIP Subsections IX.H.11, 12, and 13.**

Dear Mr. Bird:

In addition to the comments in my letter of November 14, 2013, there is one other concern regarding the proposed SIP Subsections IX.H.11, 12, and 13. Again, I appreciate your attention to these critical issues.

The emission limits under H.12.k were determined based on our pending permit modification. When the SIP is approved, the limitations are in effect. However, where equipment must be installed to effect the emission reductions that are reflected in the SIP and the permit modification, time for engineering, procurement, installation, and startup will be required. To allow for these activities, the SIP should include language that specifies that the limits are to be achieved no later than January 1, 2019.

Sincerely,

Michael S. Astin, P.E.
Environmental Manager